

42390P11172

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REMARKS

Applicants respectfully present Claims 1-19 and 21-25 for examination in the RCE filed herewith. Claim 20 was previously canceled without prejudice to the filing of continuations and/or divisionals. Additionally, Claims 23-25 have been canceled herein without prejudice to the filing of continuations and/or divisionals. No new claims have been submitted and no new matter has been introduced. Applicants respectfully submit that the claims and remarks presented herein overcome the Examiner's rejections in the Final Office Action dated September 30, 2005 in the parent application.

35 U.S.C. §102

Claims 23-25 stand rejected under 35 U.S.C. §102(b) as anticipated by Li et al, U.S. Patent No. 5,911,138 ("Li"). The Examiner submits that Li discloses all the elements in these claims. Applicants respectfully submit that without conceding the propriety of this rejection, Claims 23-25 have been canceled herein without prejudice to the filing of continuations and/or divisionals. The rejection to these claims is therefore moot and Applicants respectfully request the Examiner to withdraw the rejection.

35 U.S.C. §103

Claims 1-9, 11-13, 16, 19, 21 and 22 stand rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Banning et al, U.S. Patent No. 5,421,008 ("Banning"). Additionally, Claim 10 stands rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Banning and in further view of Hsu, U.S. Patent No. 6,374,079 ("Hsu"). And finally, Claims 14, 15, 17 and 18 stand rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Applicant's admitted prior art. Applicants respectfully traverse each and every one of the Examiner's rejections.

First and foremost, the Examiner states that "because applicant failed to traverse the Examiner's assertion of Official Notice, the common knowledge in the art statement in the last Office Action is taken to be admitted prior art." Applicants respectfully submit that the Examiner is mistaken in his assertion that Applicants' failed to traverse the Examiner's rejections. In reviewing the previously filed amendment dated July 11, 2005,

42390P11172

PATENT

Applicants clearly traversed each of the Examiner's rejections (see e.g., under headings 35 U.S.C. §102 and 35 U.S.C. §103). Specifically, with respect to the 35 U.S.C. §103 rejection in which the Examiner asserts Official Notice, Applicants' specific language read as follows:

"Claim 10 stands rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Hsu, U.S. Patent No. 6,374,079 ("Hsu"). Additionally, Claims 14, 15, 17 and 18 stand rejected under 35 U.S.C. §103 as being unpatentable over Li. Applicants respectfully traverse the Examiner's rejection."

Amendment, July 11, 2005

Applicants therefore fail to understand the Examiner's assertion that Applicants failed to traverse the Examiner's assertion of Official Notice. The above language clearly indicates that Applicants traversal applied to the previously described rejection (in which the Examiner asserted his Official Notice). Applicants are unaware of any other form of traversal that should have been made. If the Examiner believes otherwise, Applicants respectfully request the Examiner to point Applicants to rules supporting the Examiner's contention. Barring that, Applicants submit that the Examiner's statement is without basis and is erroneous.

With respect to the rejections to the claims, Applicants again traverse each and every one of the Examiner's rejections. Since the Examiner's basis for rejection relies heavily on Li, Applicants first address whether Li in fact teaches or suggests the elements that the Examiner asserts it does. Upon detailed perusal of Li, Applicants once again conclude that Li does not teach the elements of the claimed invention suggested by the Examiner.

As discussed in previous amendments, the present invention is directed at a system and method for generating a user interface that explains a computer system's search logic and results to a user. Thus, as claimed, the invention includes a "system model" and a "presentation model". As described in the specification, a system model is "a collection of data and control concepts used in the software running on the computing device, such as a search profile" while a presentation model is "a way of envisioning the process of executing the search, which is how the computing device does the search, how the user conceptualizes the search, or some combination in between the two." (Specification, Page 5, paragraph 18). Li does not disclose these elements. Instead, Li

42390P11172

PATENT

discloses a system and method for a database *search facility* having an improved user interface. Li presents a query statement and a graphical representation of its result when searched in a database simultaneously in a graphical user interface (Li, Col. 1, lines 64-67). Li does not make any efforts to explain how the query is processed to arrive at the result. In contrast, according to embodiments of the present invention, instead of simply displaying a query and results in graphical form, as in Li, embodiments of the present invention generate a user interface that shows *how* a computer system does its search. It is readily apparent to those of ordinary skill in the art that seeing a graphical form of a “query” (the request) differs significantly than viewing a graphical representation of how the query is processed.

Each of the independent claims herein includes these elements not found in Li, namely the elements of presenting a presentation model to explain how a system model relates a plurality of search input elements to a comparison element, wherein the system model is used to determine a first search result, presenting how the system model is related to the comparison element, and presenting a relative importance of the system model in comparison with the comparison element. The Examiner continues to maintain that FIG. 3A of Li teaches these elements, but Applicants strongly disagree.

As described in Li, Col. 4, lines 59-67 through Col. 5, lines 1-24, the three windows illustrated in FIG. 3A are a query window (containing the most recent query statement), the graph window (showing the results of the query statement displayed in the query window in a graphical representation) and the history window (which records the activity of the user in both the query and the graph windows, to allow the user to quickly find previously created query statements, which greatly speeds up the process of data analysis). The Examiner asserts that these windows are comparable to the presentation model as claimed herein. Applicants strongly disagree. The presentation model *explains* to a user how search input elements lead to the search results. More specifically, the presentation model in the independent claims herein explains how a system model relates a plurality of search input elements to a comparison element, wherein the comparison element is selected from a list of potential comparison elements. There is no such disclosure in Li, in FIG. 3A or otherwise.

42390P11172

PATENT

The Examiner suggests that Li teaches the presentation model for the following reason: "the presentation shown in figure 3A is clearly a 'presentation model' that includes three windows... These three windows are used to explain... how a search structure (or system model) relates a plurality of search input elements to a comparison element." Applicant fails to see how the result display in Li "explains" how the search input elements lead to the search results. Again, as described in Li, Query window 101 merely shows the query ("The query window 101 contains the most recent query statement in the current query" Li, Col. 4, lines 61-62) while Graph Window 102 shows a graphical representation of the results ("Graph window 102 shows the results of the query statement displayed in the query window in graphical representation." Li, Col. 4, lines 64-66). Similarly, the Tree window appears to show a "history" of the query ("The third window is a history window 103. In the preferred embodiment of the invention, the history of the query is presented as a graphic representation resembling a tree in which all of the query statements and their results are portrayed as nodes" Li, Col. 5, lines 3-7). These windows thus simply show the query and the results in a graphical format, with a simple scheme for the user to retrieve a previously constructed query. Nothing in these windows remotely resembles the "presentation model" claimed herein, as suggested by the Examiner.

The Examiner appears to confuse the detailed elements of the query itself as an "explanation" of the query. Applicants respectfully disagree. The query as shown in FIG. 3A of Li is a simple SQL query, well-known to those of ordinary skill in the database arts. Nothing in the query itself explains to the user how the query is processed. The Examiner's analysis of the elements in Li is therefore erroneous.

Furthermore, although the Examiner concedes that Li does not teach or suggest that a comparison element is selected from a list of potential comparison elements, the Examiner submits that Banning teaches this element and that it would have been obvious to combine Li with Banning. The Examiner thus submits that the combination of Li and Banning renders the claimed invention unpatentable. Again, Applicants respectfully traverse the Examiner's rejection.

Without addressing the propriety of combining Li with Banning, Applicants respectfully reiterate that, as discussed in detail above, Li fails to teach or suggest various

42390P11172

PATENT

elements of independent Claims 1, 8, 11 and 19. The combination of Banning with Li is thus irrelevant because neither reference teaches or suggests a presentation model, system model and/or a comparison element, as claimed. Applicants therefore respectfully submit that neither Li nor Banning, alone or in combination, renders the Claims 1-9, 11-13, 16, 19, 21 and 22 unpatentable and respectfully request the Examiner to withdraw the rejection to these claims under 35 U.S.C. §103.

With respect to Claims 10 and Claims 14, 15, 17 and 18, Applicants respectfully submit that these claims are dependent on independent Claims 1, 8, 11 and 19. As a result, Applicants also traverse the rejection of these claims and submit that the above arguments are equally applicable to these claims. In other words, since Li (with or without Banning) does not teach or suggest various claimed elements, Li does not render the independent claims (and all claims dependent on these independent claims) unpatentable. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 10, 14, 15, 17 and 18 under 35 U.S.C. §103.

42390P11172

PATENT

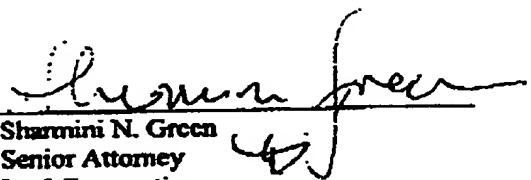
CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-19, 21 and 22 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (714) 669-1261.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

Dated: January 10, 2006



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the United States Attorney's Office for the District of Oregon and the **GREAT CATS OF THE WORLD, INC.** concerning this matter. This plea agreement supersedes all prior understandings, if any, whether written or oral, and cannot be modified other than in a written agreement that is signed by all parties. No other promises or inducements have been or will be made to the

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defendant by the parties to this agreement in connection with this case, nor have any
prosecutions or threats been made in connection with this plea.

DATED this 18th day of June, 2006.

Aug 06

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